

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

**NORTHEAST UTILITIES SERVICE  
COMPANY APPLICATION TO THE  
CONNECTICUT SITING COUNCIL  
FOR A CERTIFICATE OF  
ENVIRONMENTAL COMPATIBILITY  
AND PUBLIC NEED (“CERTIFICATE”)  
FOR THE CONSTRUCTION OF A  
NEW 345-KV ELECTRIC TRANSMISSION  
LINE FACILITY AND ASSOCIATED  
FACILITIES BETWEEN SCOVILL  
ROCK SWITCHING STATION IN  
MIDDLETOWN AND NORWALK  
SUBSTATION IN NORWALK, INCLUDING  
THE RECONSTRUCTION OF PORTIONS  
OF EXISTING 115-KV AND 345-KV  
ELECTRIC TRANSMISSION LINES,  
THE CONSTRUCTION OF BESECK  
SWITCHING STATION IN  
WALLINGFORD, EAST DEVON  
SUBSTATION IN MILFORD, AND  
SINGER SUBSTATION IN BRIDGEPORT,  
MODIFICATIONS AT SCOVILL ROCK  
SWITCHING STATION AND NORWALK  
SUBSTATION, AND THE  
RECONFIGURATION OF CERTAIN  
INTERCONNECTIONS**

**DOCKET NO. 272**

**JANUARY 28, 2004**

**TOWNS OF DURHAM AND WALLINGFORD  
SUPPLEMENTAL INTERROGATORIES  
TO THE CONNECTICUT LIGHT AND POWER COMPANY  
AND THE UNITED ILLUMINATING COMPANY**

The Towns of Durham and Wallingford (collectively, the “Towns”), each a party in the above-captioned proceeding, hereby request that The Connecticut Light & Power Company (“CL&P”) and The United Illuminating Company (“UI”)

answer the following interrogatories.<sup>1</sup> The Towns request that CL&P and UI answer the interrogatories on or before February 16, 2004. If there are objections to any of these interrogatories, or if providing responses to particular interrogatories (or portions thereof) would be unduly burdensome, the Towns request that the Respondents contact the undersigned as soon as possible.

In the event that any interrogatory requests specific data or information that has already been provided in this proceeding, the Respondents need only specifically identify where the responsive data or information is located in the record.

**I. DEFINITIONS**

A. As used in these interrogatories, "any" shall include "all," and "all" shall include "any," as needed to make the request inclusive and not exclusive.

B. As used in these interrogatories, "and" shall include "or," and "or" shall include "and," as needed to make the request inclusive and not exclusive. For example, both "and" and "or" mean "and/or."

C. As used in these interrogatories, "include" and "including" mean "including but not limited to."

D. As used in these interrogatories, "CL&P" means The Connecticut Light & Power Company and its present or former subsidiaries, affiliates, branches, divisions, principals, associated persons, control persons, directors, officers, employees, agents, trustees and beneficiaries. Each reference to CL&P shall be deemed to include any, all, or any grouping or subgrouping of persons and entities named in the foregoing enumeration as needed to make the reference inclusive and not exclusive.

E. As used in these interrogatories, "UI" means The United Illuminating Company and its present or former subsidiaries, affiliates, branches, divisions, principals, associated persons, control persons, directors, officers, employees, agents, trustees and beneficiaries. Each reference to UI shall be deemed to include any, all, or any grouping or subgrouping of persons and

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<sup>1</sup> CL&P and UI are sometimes hereinafter referred to individually as a "Respondent" and collectively as the "Respondents."

entities named in the foregoing enumeration as needed to make the reference inclusive and not exclusive.

## **II. TOWNS' SUPPLEMENTAL INTERROGATORIES TO CL&P AND UI**

Please identify the Respondent(s) and a witness responsible for each interrogatory response.

1. Reference the CL&P/UI response to Data Request D-W-01, Question D-W-016(c). Provide specific page and quotation references in the GE studies attached as exhibits b, c and d of the Companies Supplemental Filing dated December 16, 2003 which form the basis for the conclusion that the addition of these "seven miles" of additional underground cable would be highly undesirable from a reliability and operability point of view.
2. Reference the CL&P/UI response to Data Request D-W-01, Question D-W-004.
  - a. Please state whether CL&P/UI have any analyses, studies, reports, or documents, other than the referenced one line diagram, that formed the basis for its decision to dismiss the alternative under street route between Oxbow Junction and Beseck Switching Station.
  - b. If the answer to part a. is yes, please provide copies of all such materials.
3. Reference the CL&P/UI response to Data Request D-W-01, Question D-W-035(f).
  - a. Please provide copies of the analyses, studies, evaluations, and reports which examined the impact that underground construction of the 345-kV lines into the Beseck Substation (excluding the Beseck to East Devon line) would have on any or all of the following:
    - (i) the output of the Millstone Generating Station.
    - (ii) the reliability of the off-site power to the Millstone nuclear Generating Station.
    - (iii) grid reliability.
  - b. Provide copies of the analyses, studies, evaluations and reports which form the basis for the statement that "Installing a small underground section, without additional switching stations, in the existing 345-kV line from Millstone would require the Companies to remove automatic closing operations and require manual on-site inspections of the entire 345-kV line prior to reenergizing the line."

Respectfully submitted,

THE TOWNS OF DURHAM AND  
WALLINGFORD

BY \_\_\_\_\_  
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## CERTIFICATION

This is to certify that a copy of the foregoing has been mailed, first class postage prepaid, on the above date, to:

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